

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : **SUPERSEDING**
: **INFORMATION**
:
- v. - : S1 19 Cr. 832 (ER)
:
DORIAN BROOKS, :
a/k/a "Kool-Aid," :
:
Defendant. :
----- X

COUNT ONE

The United States Attorney charges:

1. In or around February 1989, in the Southern District of New York and elsewhere, DORIAN BROOKS, a/k/a "Kool-Aid," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that DORIAN BROOKS, a/k/a "Kool-Aid," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that DORIAN BROOKS, a/k/a "Kool-Aid," the defendant, conspired to distribute and possess with intent to distribute were: (i) mixtures and substances

containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C); and (ii) mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the offense charged in Count One of this Information, DORIAN BROOKS, a/k/a "Kool-Aid," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offense and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

SUBSTITUTE ASSET PROVISION

5. If any of the above-described forfeitable property, as a result of any act or omission of DORIAN BROOKS, a/k/a "Kool-Aid," the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or

deposited with, a third person;

c. has been placed beyond the jurisdiction of
the Court;

d. has been substantially diminished in value;
or

e. has been commingled with other property
which cannot be subdivided without
difficulty,

it is the intent of the United States, pursuant to Title 21,
United States Code, Sections 853(p), to seek forfeiture
of any other property of the defendant up to the value of the
above forfeitable property.

(Title 21, United States Code, Section 853.)



DAMIAN WILLIAMS
United States Attorney

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SUPERSEDING INFORMATION

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(21 U.S.C. § 846)

DAMIAN WILLIAMS
United States Attorney
